

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR  
MAIL FRAUD**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
SANDRA D. WILLIAMS	*	VIOLATION: 18 U.S.C. §1341
	*	*
	*	*

The United States Attorney charges that:

**COUNT 1**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. On or about August 29, 2005, Hurricane Katrina struck southeastern Louisiana and shortly thereafter a major disaster was declared. Similarly, a major disaster was declared in Louisiana as a result of Hurricane Rita, which made landfall on September 24, 2005. In response to these hurricanes and the damage inflicted upon the Southeastern Louisiana area, the American Red Cross (“Red Cross”) established assistance centers throughout the region in the late summer and early fall of 2005.

2. At these assistance centers, people affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also asked if they had previously received financial assistance from the Red Cross and were required to attest and sign a statement that certified that the applicant had not received any other financial assistance from the Red Cross from any other assistance center.

3. Once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued Discover or Capital One Card, issued on-site; (3) A Red Cross-issued Client Assistance Card, which the Red Cross purchased from national banks and which operated in a manner consistent with debit/credit/ATM cards, issued on-site; (4) A personal check authorized by the Red Cross and mailed through the United States Postal Service to an address provided by the applicant.

4. Paychex, Inc., a Rochester, NY-based company that had volunteered its services to the Red Cross, processed personal checks to applicants as deemed appropriate and authorized by the Red Cross. These checks were processed and issued to applicants via the United States Postal Service.

5. The defendant, **SANDRA D. WILLIAMS**, presented herself to Red Cross assistance centers on twelve occasions between on or about September 12, 2005 and on or about October 25, 2005. On at least nine visits when she applied for financial assistance, she indicated that she had not received any other financial assistance from the Red Cross. As a result of her false and fraudulent statements on these applications **SANDRA D. WILLIAMS** received direct financial assistance from the Red Cross totaling \$10,955, of which \$9,390 was fraudulently obtained.

**B.     THE SCHEME TO DEFRAUD:**

From on or about September 12, 2005 to on or about October 25, 2005 in the Eastern District of Louisiana and elsewhere, the defendant, **SANDRA D. WILLIAMS**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property from the Red Cross, by means of false representations, pretenses, and promises, by falsely and fraudulently obtaining financial assistance from the Red Cross, beyond that to which she was entitled.

It was part of the scheme and artifice to defraud that, on or about October 11, 2005, in the Eastern District of Louisiana, the defendant, **SANDRA D. WILLIAMS**, falsely and fraudulently stated that she had not received any other Hurricane Katrina or Rita financial assistance from the Red Cross at any other assistance center when, in truth and in fact, she had received such assistance on prior occasions.

**C.     THE MAILING:**

On or about October 11, 2005 the defendant, **SANDRA D. WILLIAMS**, for the purpose of executing the scheme and artifice to defraud, as alleged in Paragraph B above, did knowingly cause to be delivered to her address, in the Eastern District of Louisiana, P.O. Box 444, Gibson, Louisiana, through the United States Postal Service, a personal check authorized by the Red Cross in the amount of \$1,565. The check, numbered 1021025158, was issued by Paychex, Inc. and sent on or about October 20, 2005 via United States Postal service; all in violation of Title 18, United States Code, Section 1341.

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New Orleans, Louisiana  
October 7, 2009